

Comment on “2007-2009 Puget Sound Conservation and Recovery Plan, Agency Review of Public Review Draft. March 8, 2006.

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EPA Region 10
March 9, 2006

Priority 4: Prevent nutrient and pathogen pollution
Special Focus Area: Hood Canal

The section titled “Partners in restoring Hood Canal water quality” (Page 28) should reflect the critical role of the Department of Ecology in restoring water quality. This extends from the science work of monitoring, assessment, and water quality modeling to the implementation of Clean Water Act programs (NPDES, TMDL, and NEP). EPA is requesting that Ecology bring its water quality modeling and assessment capacity to the table on Hood Canal, and we believe Ecology’s technical work and staying power will be critically important to the planning and implementation of water quality improvement projects over the long term. The following excerpt is suggested for inclusion after the third paragraph of this section:

“The Department of Ecology implements the Clean Water Act programs in state waters, including the NPDES permits and Total Maximum Daily Load (TMDL) programs. Ecology is developing and applying water quality models to sensitive areas of the Sound to support regulatory programs, and Ecology (with matching funding from EPA) is planning to fund the development of a desktop water quality model of Hood Canal by Ecology technical staff. This project will provide a valuable tool for evaluating nutrient impacts on an expedited timeline, and the desktop platform will enable Ecology to maintain and document the model over the long term. The model will be developed in collaboration with the 3-year HCDOP study. Ecology and HCDOP are presently sharing and coordinating monitoring and modeling workplans. When both models are operational, results can be compared to build more confidence in model representations and/or identify areas of uncertainty.”